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April 9, 2004

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VIA HAND DELIVERY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Ex Parte Presentation,
Petitions for Protection from Whipsawing on the U.S.-
Philippines Route, IB Docket No. 03-38**

Dear Ms. Dortch:

On April 8, 2004, Patricia Paoletta and Heather Dixon of Wiley Rein & Fielding, counsel for Globe Telecom, Inc. ("Globe"), met with Jim Ball, Chief, Policy Division, International Bureau; Sasha Field, Assistant Division Chief, Policy Division, International Bureau; and Kim Cook, Policy Division, International Bureau. Counsel reviewed Globe's concerns about the International Bureau order in the above-captioned docket dated March 10, 2003 and updated the Bureau regarding the open Department of Justice ("Justice") investigation of Globe and the other Philippine carriers related to international termination rates.

Specifically, counsel explained that the record did not support the Bureau's finding that Globe had colluded with other Philippine carriers to whipsaw AT&T and MCI into accepting its proposed rate increase. Counsel reiterated its belief that the order must be vacated, given the questionable factual and legal bases for the Bureau's ruling, the open Justice investigation, and the fact that no carrier—U.S. or Philippine—requested reversion of the route to accounting rates.

Kindly direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Patricia J. Paoletta

Patricia J. Paoletta
Counsel for Globe Telecom, Inc.

cc: Jim Ball
Sasha Field
Kimberly Cook